

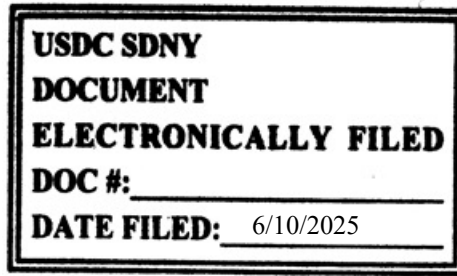


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June 10, 2025

By ECF

Magistrate Judge Katharine H. Parker
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007



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Defendant's Letter Motion is hereby GRANTED in its entirety. Further, for clarity, both Defendant's and Plaintiff's responses to the Motion to Intervene are due July 28, 2025.

APPLICATION GRANTED

Katharine H. Parker 6/10/2025
Hon. Katharine H. Parker, U.S.M.J.

**Re: Case 1:22-cv-06727-PKC UrthTech LLC et. al v. GOJO Industries, Inc.
Unopposed Motion for Extension of Schedule**

Dear Judge Parker:

Defendant GOJO Industries, Inc. ("GOJO"), respectfully moves the Court for a 30-day extension of the fact discovery and expert discovery periods to account for the recent Motion to Intervene filed by Dr. Aziz Awad (ECF 139-142). In conjunction with this extension, GOJO also seeks an extension of time to respond to Dr. Awad's motion to intervene, which is currently due on June 12, 2025. Additionally, as the Court's resolution of Dr. Awad's status as a party is a key issue to resolve for purposes of any potential settlement, GOJO respectfully submits that the currently-scheduled settlement conference be moved from June 23, 2025 to a date after the Motion to Intervene has been ruled upon. UrthTech does not oppose the foregoing extensions of time.

Through his Motion to Intervene, Dr. Awad (who was a co-plaintiff when this matter was originally filed but was not a named plaintiff after UrthTech amended its Complaint) claims that he should be "reinstated as a plaintiff" to assert trade secret claims against GOJO and that the "Court acknowledge my sole ownership of the six trade secrets at issue..." The filings raise new information on a variety of issues, including the question of who is the real party in interest in this suit and whether the elements for trade secret protection have been met, irrespective of who might be the real party in interest. Thus, GOJO should be permitted to conduct limited discovery as to these issues in the form of documentary and deposition discovery in order to respond to the Motion to Intervene and to otherwise defend itself against the claims asserted against it.

This Motion is not interposed for purposes of delay and good cause exists to grant the same given the just-filed Motion to Intervene.

The proposed amended schedule is as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Revised Deadline</u>
<u>Close of Fact Discovery</u>	<u>June 13, 2025</u>	<u>July 14, 2025</u>

<u>Response to Motion to Intervene</u>	<u>June 12, 2025</u>	<u>July 28, 2025</u>
<u>Opening expert reports due</u>	<u>July 14, 2025</u>	<u>August 15, 2025</u>
<u>Rebuttal expert reports due</u>	<u>August 11, 2025</u>	<u>September 12, 2025</u>
<u>Expert discovery complete</u>	<u>September 12, 2025</u>	<u>October 13, 2025</u>
<u>Settlement Conference</u>	<u>June 23, 2025</u>	<u>To be scheduled upon ruling on Motion to Intervene</u>

Respectfully submitted,

By: /s/Andrew W. Alexander

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2025, a copy of the foregoing is being served on all counsel of record via the CM/ECF system and by first-class U.S. Mail on the proposed intervenor, Dr. Aziz Awad, at the physical address specified in his motion papers, i.e., 8131 Parkside Drive, Westland, MI 48185. Dr. Awad is also being served by electronic mail at the e-mail address specified in his motion papers, namely, aziz.awad@icloud.com

/s/ Andrew W. Alexander
Attorney for Defendant GOJO Industries, Inc.